



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

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May 9, 2017

Assistant U.S. Attorney Michael Sullivan
Office of the United States Attorney
801 W. Superior Ave., Suite 400
Cleveland, Ohio 44113

**Re: *In re Dean Maynard Boland*
United States Bankruptcy Court for the Northern District of Ohio
Chapter 7 Case No. 16-10250
Adversary Case No. 16-01058**

Dear AUSA Sullivan:

You have been requested by counsel for Jane Doe and Jane Row to appear and testify regarding official Department of Justice information in the above captioned adversarial proceeding. Pursuant to 28 C.F.R. § 16.24, you are hereby authorized to appear and to testify regarding the following matters in the above captioned case:

1. Your formal education and general employment history as an Assistant U.S. Attorney;
2. Your general duties as an Assistant U.S. Attorney's;
3. Your personal knowledge of the publically available information regarding the investigation of Dean Boland relating to the use of images of real minors which he digitally manipulated to create images depicting sexual conduct which resulted in a pre-trial diversion agreement;
4. Your personal knowledge of the publically available information regarding the diversion agreement entered into by Dean Boland; and

**GOVERNMENT
EXHIBIT**

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5. Your personal knowledge of the United States Attorney's Office's notification to Dean Boland that he had made a statement contradicting a statement of fact contained in his pretrial diversion agreement, and his subsequent repudiation of such statement.

With regard to these authorized areas of testimony, you are not authorized to disclose any information that would disclose privileged information, including, but not limited to, the following:

- A. Information regarding any other federal investigations, cases or activities;
- B. Classified and classifiable information;
- C. Information that would reveal the internal deliberative process within the United States Department of Justice, including the United States Attorney's Office, the FBI, and/or any other federal departments or agencies;
- D. Information that would reveal a confidential source or informant;
- E. Information the disclosure of which would violate a statute, including laws governing grand jury proceedings;
- F. Information that would reveal trade secrets;
- G. Information that could threaten the lives or safety of any individual, including home addresses of law enforcement personnel;
- H. Information that could interfere with ongoing investigations and/or prosecutions;
- I. Information that could reveal investigative or intelligence gathering and dissemination techniques whose effectiveness would be thereby impaired;
- J. Privileged attorney-client information;
- K. Information that would reveal attorney work product or matters of prosecutorial discretion;

- L. Information that would reveal the deliberative process of the Department of Justice;
and
- M. Opinion testimony related to facts or information acquired as part of your
performance of your official duties.

If you are asked to testify beyond the limits stated above, you should respectfully decline to answer and explain that 28 C.F.R. § 16.22(a) precludes you from doing so. Further, you are not authorized to disclose official information on any other subject. If you have any questions, please do not hesitate to contact Assistant U.S. Attorney James Bennett (216-622-3988).

Sincerely,


DAVID A. SIERLEJA
Acting United States Attorney